Mr. Michael G. Gaffney Site Vice President Kewaunee Nuclear Power Plant Nuclear Management Company, LLC N490 State Highway 42 Kewaunee, WI 54216

SUBJECT: KEWAUNEE NUCLEAR POWER PLANT - REQUEST FOR ADDITIONAL

INFORMATION (RAI) REGARDING RESPONSE TO GENERIC LETTER

2004-02 (TAC NO. MC4691)

Dear Mr. Gaffney:

By letter dated March 7, 2005, Nuclear Management Company, LLC (the licensee) provided the 90-day response to U.S. Nuclear Regulatory Commission (NRC) Generic Letter (GL) 2004-02, "Potential Impact of Debris Blockage on Emergency Recirculation During Design-Basis Accidents at Pressurized-Water Reactors," for Kewaunee Nuclear Power Plant. The GL requested the licensee perform an evaluation of the emergency core cooling system and containment spray system recirculation functions in light of the information provided in the GL and, if appropriate, take additional actions to ensure system function. Additionally, addressees were requested to submit to the NRC, the information specified in the GL.

The NRC staff has completed its preliminary review of your response and has determined it needs additional information requested in the enclosure to complete our review. This RAI requests additional information about your overall plans and schedules and not any information on detailed plans or extensive analyses. In light of this, please provide the additional information requested in the enclosure within 30 days of receipt of this letter.

If you have any questions, please call me at (301) 415-2296.

Sincerely,

/RA/

Carl F. Lyon, Project Manager, Section 1
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-305

Enclosure: Request for Additional Information

cc w/encl: See next page

Mr. Michael G. Gaffney Site Vice President Kewaunee Nuclear Power Plant Nuclear Management Company, LLC N490 State Highway 42 Kewaunee, WI 54216

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LRaghavan TKozak DCullison/DSolorio

FLyon DSSADPR MWebb

ACCESSION NO.: ML051470115* RAI input from the staff without any major change

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OFFICE	PDIII-1/PM	PDIII-1/LA	DSSA/SPLB/SP*	PDIII-1/SC
NAME	FLyon	THarris	DCullison/DSolorio	JStang for LRaghavan
DATE	05/27/05	05/27/05	05/23/05	05/27/05

REQUEST FOR ADDITIONAL INFORMATION

REGARDING RESPONSE TO GENERIC LETTER 2004-02

KEWAUNEE NUCLEAR POWER PLANT

NUCLEAR MANAGEMENT COMPANY, LLC

DOCKET NO. 50-305

By letter dated March 7, 2005, Nuclear Management Company, LLC (the licensee) provided the 90-day response to U.S. Nuclear Regulatory Commission (NRC) Generic Letter (GL) 2004-02 for Kewaunee Nuclear Power Plant. The GL requested that addressees perform an evaluation of the emergency core cooling system and containment spray system recirculation functions in light of the information provided in the GL and, if appropriate, take additional actions to ensure system function. Additionally, addressees were requested to submit to the NRC the information specified in the GL. The NRC staff has completed its preliminary review of your response and has determined it needs the following additional information to complete our review:

- 1. In your 90-day response to GL 2004-02, you indicated that you intend to use future test results, industry guidance, and NRC guidance to account for chemical precipitants in your evaluation and their availability will impact the schedule for performing an evaluation. The cooperative NRC-Electric Power Research Institute tests in progress at the University of New Mexico are designed to determine if chemical effects occur, but are not designed to measure head loss associated with any chemical effects. The NRC staff notes that some chemical effects have been observed in the initial three tests.
- 2. In your 90-day response to GL 2004-02, you indicated that you intend to use industry owners' group guidance and component manufacturer data to evaluate long-term performance degradation of downstream susceptible components caused by debris-laden fluid and their availability will impact the schedule for performing an evaluation.

For both of these issues, you state their evaluation may occur after the September 1, 2005, response due date, depending on the schedule for testing and the availability of industry guidance. This is contrary to the information requested in GL 2004-02, that chemical and downstream effects be addressed in the September 1, 2005, response. This delay is also contrary to the NRC staff's position that there is sufficient reason to address sump vulnerability that the NRC staff is not going to wait for additional test results, and that the September response will be incomplete if the evaluation is incomplete, the design is not complete, or there is no schedule for upgrades. In that light, please discuss your plans and schedule for evaluating chemical effects and the long-term downstream effects. Discuss any plans for performing testing to support your evaluation of these effects.

Kewaunee Nuclear Power Plant

CC:

John Paul Cowan
Executive Vice President &
Chief Nuclear Officer
Nuclear Management Company, LLC
700 First Street
Hudson, WI 54016

Plant Manager Kewaunee Nuclear Power Plant N490 Highway 42 Kewaunee, WI 54216-9511

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Resident Inspectors Office U. S. Nuclear Regulatory Commission N490 Hwy 42 Kewaunee, WI 54216-9511

Regional Administrator, Region III U. S. Nuclear Regulatory Commission 2443 Warrenville Road, Suite 210 Lisle, IL 60532-4352

Jonathan Rogoff Vice President, Counsel & Secretary Nuclear Management Company, LLC 700 First Street Hudson, WI 54016

Larry L. Weyers Chairman, President and CEO Wisconsin Public Service Corporation 600 North Adams Street Green Bay, WI 54307-9002 David Zellner Chairman - Town of Carlton N2164 County B Kewaunee, WI 54216

Mr. Jeffery Kitsembel Electric Division Public Service Commission of Wisconsin PO Box 7854 Madison, WI 53707-7854